

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

LARGAN PRECISION CO., LTD.,

Plaintiff,

v.

**ABILITY OPTO-ELECTRONICS
TECHNOLOGY CO., LTD., NEWMAX
TECHNOLOGY CO., LTD., AND HP INC.,**

Defendants.

Civil Action No. 4:19-cv-696-ALM

DECLARATION OF DAVID M. HOFFMAN

I, David M. Hoffman, declare as follows:

1. I am a principal at the law firm of Fish & Richardson P.C., counsel of record in this action for Defendant Newmax Technology Co., Ltd. (“Newmax”), and I make this declaration on behalf of Newmax. I am a member of Bar of the State of Texas. I have personal knowledge of the matters stated in this declaration and would testify truthfully to them if called upon to do so.

2. On March 2, 2020, I searched google.com/flights for flights between Taipei, Taiwan, and San Francisco, California, departing one month from today (Thursday, April 2, 2020). There were direct flights available between the two cities.

3. On March 2, 2020, I searched google.com/flights for flights between Taichung City, Taiwan, and San Francisco, California, departing the same day as in paragraph 2. There were flights with one layover available between the two cities.

4. On March 2, 2020, I also searched google.com/flights for flights between Taipei, Taiwan and Sherman, Texas, departing the same day as in paragraph 2. There were no direct flights

between the two cities nor one-stop flights between the two cities. All of the flights that had only one layover terminated in Dallas, Texas.

5. On March 2, 2020, I searched [google.com/flights](https://www.google.com/flights) for flights between Taichung City, Taiwan, and Sherman, Texas, departing the same day as in paragraph 2. There were no direct flights nor one-stop flights between the two cities. The only flight that had only one layover terminated in Dallas, Texas.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed at Austin, Texas this 2nd day of March, 2020.

Dated: March 2, 2020

/s/ David M. Hoffman
David M. Hoffman